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DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service
Agency for Toxic Substances
and Disease Registry

Memorandum

Date March 23, 1990

From William Nelson *WLN*
Regional Representative
RRT Member

Subject Regional Response Team/OSC Report for
Tidewater Bailing Corporation Site

To Richard Salkie
RRT Co-Chairman
EPA Region II

The Agency for Toxic Substances and Disease Registry received a request from the Region II Response Team Chairman to review and comment on the On-Scene Coordinator's Report on the Tidewater Bailing Corporation Site located in Newark, Essex County, New Jersey.

The report and request was received in the ATSDR Regional Office on March 14, 1990. Although it may have arrived earlier the Report was immediately and initially reviewed by the Regional Representative who subsequently called the ATSDR Emergency Response Branch in Headquarters to help assist in reviewing the sampling data. A response from ATSDR's Emergency Response Branch was obtained that same afternoon. The following comments are being submitted for consideration:

1. ATSDR is concerned that the length of time it took from NJDCP's first investigation in August of 1986 until the time it was formally referred to EPA in February of 1989 for an emergency removal action. Although both NJDEP and the City of Newark secured the marsh area with fencing and warning signs, these protective measures were not adequate to mitigate human exposure and either more effective steps should have been taken to restrict the area or the site should have been referred at a much earlier time.
2. The sampling data presented in the report was inadequate for the reviewer to determine whether or not a public health threat existed. Although sampling locations, numbers and matrix were presented, the only mention of the results appeared on page 2 in Appendix A which indicated the presence of PCB's (100 ppm), lead (130 ppm), arsenic (26 ppm), cadmillon (3.3 ppm) hexavalent chromium (5.6 ppm) and zinc (250 ppm) in soil.

The only contaminants of potential concern are the PCB's which are high but do not represent an immediate health threat. In addition, there is no analytical method utilized by EPA to specifically identify hexavalent chromium; only total chromium. The remaining metals do not represent a health concern.

3. The sampling data presented above appeared to represent only soil contamination. No data was reported regarding the uncontrolled surface water runoff nor possible groundwater contamination.
4. On page 8, the report indicates that the facility itself may be contaminated and that worker safety may be a problem. If this is the case, the site should be reported to OSHA for investigation.
5. ATSDR was pleased to see that a community relations plan was included in the report. Obviously the citizens are concerned about the site and the presence of a community relations plan should help alleviate their concerns and strengthen public relations.

If you have any questions or comments regarding this report please contact me at (212) 264-7662.

cc: George Buynoski
Lynn Wilder
~~Gene Dominach, EPA, Edison~~
John Ulshoefer